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6 Attorneys for Defendants
7 Aaron Kaufman, Rick Schwartz, Machete's Chop
Shop, Inc. and Overnight Productions, LLC
8

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11

12 224 ENTERTAINMENT, LLC, a
California Limited Liability Company,
13
14 Plaintiff,

15 vs.

16 AARON KAUFMAN, an individual;
RICK SCHWARTZ, an individual;
MACHETE'S CHOP SHOP, INC., a
17 Texas corporation; OVERNIGHT
PRODUCTIONS, LLC, a Delaware
18 limited liability company; and DOES 1
through 10, inclusive,

19 Defendants.
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Case No. CV10-01501 DSF (VBKx)

**NOTICE OF SETTLEMENT AND
JOINT STIPULATION TO
SUSPEND DEADLINES PENDING
DISMISSAL**

**[PROPOSED] ORDER LODGED
CONCURRENTLY**

Complaint Served: February 3, 2010

Action Removed: March 1, 2010

Scheduling Conference: June 28, 2010

1 Plaintiff 224 Entertainment, LLC ("Plaintiff") and defendants Aaron Kaufman,
2 Rick Schwartz, Machete's Chop Shop, Inc. and Overnight Productions, LLC
3 (collectively, "Defendants"), by and through their undersigned counsel of record,
4 hereby respectfully report and stipulate as follows:

5 1. All parties have now agreed upon the terms of a settlement to resolve
6 this entire action, and the parties' counsel are now preparing comprehensive
7 settlement documents to memorialize this settlement. Those documents are
8 somewhat complex, as the action involves issues of motion picture finance.

9 2. The Defendants' response to the Plaintiff's First Amended Complaint is
10 presently due to be filed and served no later than April 27, 2010. Counsel have
11 already met and conferred regarding that response, but now wish to stipulate to
12 suspend further deadlines in this matter for approximately forty-five additional days
13 in order to give them time to prepare, document and execute their settlement
14 agreement.

15 3. A Scheduling Conference is now scheduled in this Action for June 28,
16 2010, and the parties anticipate that this action will, pursuant to their settlement, be
17 dismissed in its entirety before that time.

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19 Accordingly, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

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21 All pending deadlines in this matter are suspended until June 11, 2010.
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1 Dated: April 19, 2010

LAVELY & SINGER
PROFESSIONAL CORPORATION
MARTIN D. SINGER
TODD S. EAGAN

2
3
4 By: 

5 TODD S. EAGAN
6 Attorneys for Plaintiff
7 224 ENTERTAINMENT, LLC
8

9 Dated: April 19, 2010

10 LINER GRODE STEIN YANKELEVITZ
11 SUNSHINE REGENSTREIF & TAYLOR LLP

12 By: 

13 Michael L. Novicoff
14 Daniel R. Gutenplan
15 Attorneys for Defendants
16 AARON KAUFMAN, RICK
17 SCHWARTZ, MACHETE'S CHOP
18 SHOP, INC. and OVERNIGHT
19 PRODUCTIONS, LLC
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